

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEW JERSEY**

KARIM T. G.,

*Petitioner,*

v.

ATTORNEY GENERAL, JEFF SESSIONS,

*Respondent.*

Case No: 2:18-17175 (ES)

**NOTICE OF MOTION FOR  
ORDER TO SHOW CAUSE,  
PRELIMINARY INJUNCTION AND/OR  
TEMPORARY RESTRAINING ORDER,  
PURSUANT TO FED. R. CIV. P. 65,  
AND L. CIVIL RULE 65.1**

**Motion Day: May 18, 2020**

**PLEASE TAKE NOTICE:**

Petitioner, Karim T. G., will move before the Honorable Judge Esther Salas, U.S.D.J. on May 18, 2020, for an Order to Show Cause, ordering Respondents to show cause why the Court should not grant Petitioner's motion for a preliminary injunction and/or temporary restraining order, pursuant to Fed. R. Civ. P. 65 and L. Civ. R. 65.1(a), granting the Petitioner immediate release from custody and restraining Respondents from re-detaining Petitioner for civil immigration purposes for the remainder of his removal proceedings, including any and all administrative or judicial appeals.

In support of this motion, Petitioner will rely on the attached Memorandum of Law, certification of counsel pursuant to Fed. R. Civ. P. 65(b), Affidavits of Fact Showing Entitlement to Relief by Petitioner, per Local Rules 7.1 and 7.2, and supporting documentary evidence, Exhibits A – R.

A proposed Order to Show Cause, and Preliminary Injunction Order ("with temporary restraints") are submitted herewith.

Oral Argument is specifically requested by Petitioner.

Counsel for Petitioner has provided notice of Petitioner's intent to file this application to counsel for Respondent, Mr. Enes Hajdarpasic.

1       Petitioner respectfully requests for the Court to order his immediate release  
2 on his own recognizance, under such conditions of supervision as the Court deems  
3 necessary to ensure legitimate government objectives, such as flight prevention  
4 and/or protection of the community.

5       He further seeks for the Court to also restrain the Respondent from re-  
6 detaining him for civil immigration purposes, for the rest of his removal proceedings,  
7 including any appeals, administrative or judicial.

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9 Dated: April 24, 2020

Respectfully submitted,  
10 /s/ John P. Leschak  
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